

1. From at least in or about September 2016, up to and including in or about December 2016, in an offense begun and committed outside of the jurisdiction of any particular State or district of the United States, JAMAL BIN NOOR MAIDEEN, a/k/a "Jamal Mohiadeen bin Noor Maideen," a/k/a "Jamal Mohiadeen Noor Maideen," a/k/a "Raymond," the defendant, and others known and unknown, at least one of whom is expected to be arrested in and first brought to the Southern District of New York, knowingly did combine, conspire, confederate, and agree together and with each other to launder money, in violation of Section 1956(a)(3)(B) of Title 18, United States Code.

2. It was a part and an object of the conspiracy that JAMAL BIN NOOR MAIDEEN, a/k/a "Jamal Mohiadeen bin Noor Maideen," a/k/a "Jamal Mohiadeen Noor Maideen," a/k/a "Raymond," the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowingly would and did conduct and attempt to conduct a financial transaction involving property represented and believed to be the proceeds of specified unlawful activity, to wit, illegal narcotics trafficking, with the intent to conceal and disguise the nature, location, source, ownership and control of that property, in violation of Title 18, United States Code, Section 1956(a)(3)(B).

(Title 18, United States Code, Sections 1956(h) and 3238.)

COUNT TWO  
(Money Laundering)

The Grand Jury further charges:

3. In or about December 2016, in an offense begun and committed outside of the jurisdiction of any particular State or district of the United States, JAMAL BIN NOOR MAIDEEN, a/k/a "Jamal Mohiadeen bin Noor Maideen," a/k/a "Jamal Mohiadeen Noor Maideen," a/k/a "Raymond," the defendant, who is expected to be arrested in and first brought to the Southern District of New York, knowingly, and with the intent to conceal and disguise the nature, location, source, ownership, and control of property

believed to be the proceeds of specified unlawful activity, to wit, illegal narcotics trafficking, did conduct and attempt to conduct a financial transaction involving property represented to be the proceeds of specified unlawful activity, to wit, BIN NOOR MAIDEEN arranged to receive funds in Australia, that were represented to be the proceeds of narcotics trafficking, and transported a portion of those funds to the United States, in a manner designed to conceal and disguise the source and ownership of the funds.

(Title 18, United States Code, Sections 1956(a)(3)(B), 2, and 3238.)

FORFEITURE ALLEGATION

4. As a result of committing the money laundering offenses alleged in Counts One and Two of this Indictment, JAMAL BIN NOOR MAIDEEN, a/k/a "Jamal Mohiadeen bin Noor Maideen," a/k/a "Jamal Mohiadeen Noor Maideen," a/k/a "Raymond," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offenses, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offenses.

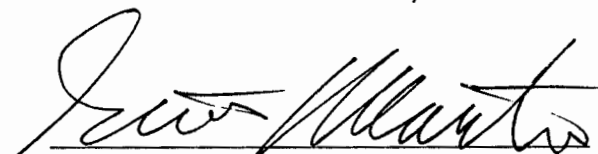
Substitute Asset Provision


5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
FOREPERSON  
1/6/17

  
PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

JAMAL BIN NOOR MAIDEEN,  
a/k/a "Jamal Mohiadeen bin Noor Maideen,"  
a/k/a "Jamal Mohiadeen Noor Maideen,"  
a/k/a "Raymond,"

Defendant.

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INDICTMENT

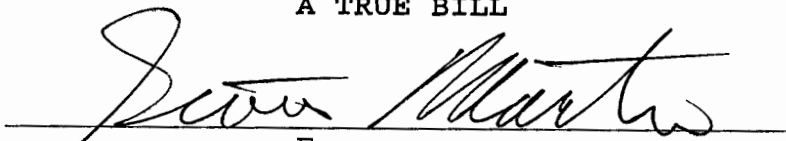
17 Cr.

(18 U.S.C. §§ 1956(a)(3)(B), 1956(h),  
2, and 3238)

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PREET BHARARA  
United States Attorney.

A TRUE BILL

  
Foreperson.

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1/6/16 Fld. Indictment under seal. A/W issued

Pitman, USMJ  
BH